

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 09-10243-MLW
)
RYAN HARRIS)

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States of America and defendant Ryan Harris hereby submit this joint memorandum addressing the issues set forth in Local Rule 116.5(A)(1) through (A)(7).

(A)(1)

Defendant seeks relief from the timing requirements of Local Rule 116.3 and asks for an additional two weeks to file discovery letters.

(A)(2)

The defendant requests discovery concerning expert witnesses under Fed. R. Crim. P. 16(a)(1)(E). The government should respond eight weeks before trial. The government requests reciprocal discovery which defendant will provide four weeks before trial.

(A)(3)

The parties at this time are uncertain whether additional discovery will be needed as a result of future receipt of information, documents, or reports of examinations or tests.

(A)(4)

Defendant seeks a period of 50 days to file pretrial motions. The parties submit that a motion date should be set after the government has had an appropriate time to respond.

(A)(5)

A period of excludable delay should be ordered under the Speedy Trial Act from the date of the conference through the date of the interim conference set for April 29, 2010.

(A)(6)

The government estimates that its case will take 15 trial days.

(A)(7)

The parties defer to the Court regarding the setting of a final status conference and/or any interim status conference.

CARMEN M. ORTIZ
United States Attorney

RYAN HARRIS
By his attorney,

By: /s/ Adam J. Bookbinder

/s/ Charles P. McGinty

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